DOCUMENT RESUME

ED 151 957 EA 010 454

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TITLE Program Development in Compensatory Education: ESEA Title I and the State Role in Improving Education.
PUB DATE 29 Mar 78
NOTE 21p.; Paper presented at the Annual Meeting of the American Educational Research Asscciation (Toronto, Ontario, March 27-31, 1978)

EDRS PRICE MF-$0.83 HC-$1.67 Plus Postage.
DESCRIPTORS *Change Strategies; Comparative Analysis; *Compensatory Education; Educational Accountability; Educational Change; Educationally Disadvantaged; Needs Assessment; Parent Participation; *Program Administration; Program Design; Program Evaluation; School District Autonomy; State Departments of Education; *State School District Relationship
IDENTIFIERS *Elementary Secondary Education Act Title I

ABSTRACT

This paper examines how states have responded to the planning, evaluation, and parent participatien components of compensatory education programs to promote reform at the local level. Particular attention is given to the interaction between state political culture, legislative requirements, and state education agency leadership style, and their collective influence on local implementation. The examination is based on data cbtained in a national study of state and local administration cf compensatory educatien conducted for the National Institute of Education. (Author/MLF)

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PROGRAM DEVELOPMENT IN COMPENSATORY EDUCATION: ESEA TITLE I AND THE STATE ROLE IN IMPROVING EDUCATION

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Prepared for the Symposium:

STATE STRATEGIES FOR EDUCATION REFORM

Annual Meeting of the
American Educational Research Association
Toronto, Canada
March 29, 1978

EA 010 454

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Introduction

Some of the more interesting education improvement programs initiated by state legislatures and/or state education agencies have been directed towards increasing the capacity and willingness of school districts and individual schools to systematically and comprehensively plan and evaluate their instructional programs, and to include citizen/parents in that process. California's Early Childhood Education Program (ECE) and the school site management and parent participation components of Florida's 1973 legislation are two prominent examples. Both programs seem to be based on the assumption that the efficiency and the effectiveness of educational services will be increased if (1) the key program design decisions are made at the unit that delivers the services in order to better match those services to the needs of pupils, and (2) the services provided match the expectations of parents. State and federal efforts to promote structural changes at the local level, such as increasing the capacity to systematically plan and evaluate instructional services, range from efforts to force change through regulations and state monitoring procedures, to strategies that seek to change individual behavior by addressing the self interest of local officials.

It is not surprising that state strategies for education reform often seem to be caught in a tension between a regulatory or compliance approach and a persuasion or technical assistance approach. On the one hand, state legislatures are demanding more "accountability" and "effectiveness" from the schools, and are becoming preoccupied with statewide testing and minimum competency programs. Such concerns would seem to suggest an assertive state posture towards schools. On the other hand, both policy makers and SEA officials have traditionally seen most of the key program design and decision participation practices of school districts as local rather than state prerogatives. Also, knowledge about how to improve the operation and effectiveness of local schools often seems to be as elusive to state officials as it is to principals and teachers, thus states are reluctant to tell LEAs what to do in program development.

These tensions regarding the ways in which and the extent to which states should seek to influence local program decisions or the manner in which those decisions are made, have been a recurring and as yet unsolved issue in the administration of ESEA Title I at the federal and state levels. Though rarely seen as an innovative or specifically a school improvement program, the implementation of Title I has several dimensions that are comparable to the problems that states face in implementing their own more broad-based programs. Like the instructional and curricular provisions in state legislation that affect how LEAs operate regular school programs, Title I has a well established though not always well understood legal framework within which states are expected to provide direction and oversight to local implementation. That legal framework and both federal and state administration of the structural characteristics of Title I are heavily compliance oriented, particularly with respect to those regulations that govern the allocation of funds to districts and schools and the selection of participating pupils as well as the nature of the services that pupils receive. Title I is, at very least, implicitly prescriptive with respect to district responsibilities in the areas of program development--needs assessment, program design, program evaluation--and parent participation. But as shall be discussed in a subsequent section of this paper, neither the federal government nor any of the states seem as yet to have solved the tension between compliance oriented process requirements and leadership for change, or between state and local values.

Compensatory education programs operated by most school districts and schools seem to be as resistent to systematic review and modification as regular instructional programs. Constraints to program improvement include the following:

- Existing programs tend to become institutionalized. Many have been in place for several years, often with the same staff, and that staff resists change, particularly to the extent that change implies criticism of past performance. Also, many programs seem to reflect commitments to investments in hardware and instructional materials that preclude serious consideration of alternative instructional strategies.
- Substantial changes in program design often require changing staff. In Title I one of the major issues regarding staff changes concerns shifting the balance between teachers and paraprofessional aides. Community resistance to eliminating aide positions may have more

to do with program design in many districts than evidence of educational need or evaluations of program success.

- Predisposition of professionals to operate on intuition. This characteristic is reinforced by the lack of confidence and/or expertise on the part of most teachers and administrators in much of the testing and other assessment data available for decision making.

- Reductions in resources limit program options. The availability of slack resources represents a natural entry point for promoting change, but many districts and schools experience reductions in funding or stable funding that results in fewer actual resources. In such conditions, planning is simply relegated to deciding which jobs should be eliminated in many cases. Program decisions are often made on criteria very different from those related to the needs of pupils, or the success of the program.

State and local experiences in administering the Title I program development procedures can tell us much about the conditions and state strategies that seem to promote continued and effective examination of program effectiveness. For example, how much and what type of state direction is appropriate and necessary? What are the trade-offs between a compliance and a technical assistance state orientation, between the overt use of legal authority to force change and a non-directive state approach? To what extent is technical capacity a pre-requisite of change in the process of program decision making?

The comments in this paper are based upon a study for the NIE of the administration of ESEA Title I at federal, state and local levels that I participated in at the Syracuse Research Corporation (SRC), as well as subsequent and independent examinations of program administration in additional states and districts.[1] The SRC project was a comparative case analysis of the effect of federal and state requirements and administrative procedures on the operation of local programs in 116 Title I schools in 32 LEAs in eight states. SRC staff and consultants interviewed over 1,000 administrators, teachers, parents, paraprofessional aides and students at all three levels.

Program Development Requirements in Title I

The federal government's Title I regulations and guidelines can fall into two roughly distinct groups, those that address funds allocation procedures and those in the program development area. Funds allocation regulations are intended to assure that Title I funds and services reach those schools and pupils for which the program is intended--educationally disadvantaged pupils in schools with large concentrations of low-income pupils. While numerous implementation problems continue to exist regarding the funds allocation regulations[2], it is probably fair to say that the clarity of communications and the administrative oversight procedures of federal and most state agencies have at least demonstrated a capacity to attain compliance. As a generalization, Title I is operated as a categorical program serving its specific target population.

The program development regulations address those procedures associated with needs assessments, program design, targeting of children and program evaluation. The federal government expects local education agencies to conduct needs assessments and program evaluations for the purpose of improving the design and operation of Title I programs in order to more effectively meet the needs of target children.[3] Needs assessment is seen as a set of activities designed to generate data on which to base (1) pupil targeting decisions and (2) program design decisions.[4] Similarly, the evaluation requirement has two purposes: (1) objective measurement of the extent to which project objective and sub-objectives have been met and (2) analysis of why project activities or services were, or were not, successful and how future programs might be made more effective.[5]

It should be remembered that the administration of ESEA Title I at the state and local levels is characterized by a considerable structure. Each LEA is required to annually submit a proposal to the SEA for approval in which the district indicates how it plans to use the Title I entitlement. Most if not all SEAs collect information in the annual proposal regarding the needs assessment and evaluation procedures to be employed by LEAs as well as about the programs that each LEA expects to operate. Some states require districts to submit considerable detail regarding how programs will be evaluated. In addition, LEAs are expected to have

information readily available at the local level that is not included in the annual proposal, and SEA staff make periodic site visits to LEAs in order to monitor compliance with federal and state regulations. Also, SEAs give considerable attention to technical assistance and dissemination activities designed to inform and instruct local officials regarding their obligations, and about more effective ways to achieve program objectives. Particularly in those districts with large programs, local and state Title I officials will be in frequent formal and informal contact over the course of a school. Given the structure of Title I administration, then, it would seem that considerable opportunity exists for states to influence local operation of compensatory education programs with respect to the program development objectives of the federal government.

In the SRC study of Title I administration we found that none of the 32 LEAs routinely carried out a systematic process that effectively matched the above conception of a comprehensive program development and improvement strategy. Specifically, we found the following:

- "Needs assessment" tends to be viewed at both the state and local levels as synonymous with pupil selection, the first of the two purposes for which the activity is intended, and "evaluation" generally means little more than achievement testing. Attention is rarely given to the program planning and review aspects of needs assessments and evaluations.

- The needs assessment and evaluation activities conducted by LEAs are, as a rule, seen primarily as technical activities to fulfill state reporting requirements, not as activities directly relating to the improvement of local services for educationally deprived children.

- In five of the eight states studied, program development activities are viewed from a compliance rather than an educational improvement perspective. State concerns with program design are generally limited to encouraging or requiring program designs that clearly avoid audit exceptions.

- Three of the states stressed needs assessment, planning and evaluation functions more than the other five. In two of these states the LEAs as a group are far more concerned with program development activities than LEAs in other states, but states no district has yet institutionalized a comprehensive needs assessment, program planning and evaluation procedure primarily to meet its own needs at the district and school levels.

All eight states operate Title I programs under the identical structure provided by the federal government's statutes, regulations and guidelines, as well as within a basically common federal approach to monitoring state performance. What factors explain why, then, districts in three of the states seem to be more concerned with at least some program development functions, than do districts in the other five states? The difference seems to be explained by the way that states approach their administration of Title I, particularly the extent to which they use the structure provided by the federal requirements to serve state purposes.

The Importance of State Role Orientation

State Title I offices clearly approach their administrative and leadership responsibilities in very different ways. To understand the implications of those differences for local district implementation of Title I, one must look at more than superficial indicators of administrative activity or policy statements to discover the explicit or implicit messages that SEAs communicate to their LEAs. Four of the eight states in the SRC study intended to have and, in fact, did have a major influence upon local district activity, while in the other four, state influence was much less pronounced. We categorized the former group as directive states, since SEA policy and practice is designed to direct districts to approach Title I in a particular manner and with particular programatic thrusts. This differs significantly from the stance of the four nondirective states, where Title I procedures and program characteristics are clearly dominated by local conditions, concerns and values.

The directive/nondirective dichotomy represents one aspect of the playing out of tensions that exist among possible state roles as educational system reformer (reformist mode), regulator (regulatory mode), and unobtrusive administrator (system-maintenance mode). Whereas each of the eight states included in the SRC study plays all three roles to some extent, in nondirective states the role of unobtrusive administrator, whose primary job is to ensure that federal and state dollars flow smoothly and continuously to local school districts, tends to dominate

state/local interractions. In the more directive states the roles of system regulator, reformer, or both dominate.

The implications of state directiveness are important to understand in terms of the dynamics of state/local interactions. A state that is primarily nondirective may have an identical formal requirement to another state which is much more directive. The two states, however, will communicate different expectations for district behavior. For example, a directive state operating primarily in the reformist mode may require a narrative description of the program design process in the annual application. A nondirective state operating in the system maintenance mode may have the same requirement. However, districts in the first state know that the SEA will pay careful attention to their program design process, and will therefore respond with a commensurate level of attention to that concern. Districts in the second state, on the other hand, know that the SEA will pay only cursory attention to this portion of their application, and they will respond accordingly.

Thus, in the four directive states, local Title I activities were often undertaken with state preferences and expectations clearly in mind. Indeed, local officials were sometimes unaware that a particular procedure or requirement was state rather than federally generated. By contrast, districts in the four nondirective states were aware that their SEAs refrained from getting involved in local administration unless necessary for system maintenance -- to stay out of trouble -- or unless specifically invited by an LEA to do so. Districts in these states were well aware of their SEA's role orientation and were consequently much less inclined to consider state policy preferences and expectations when planning their Title I programs than districts in directive states.

The four nondirective states and one of the directive states emphasize bureaucratic administrative responsibilities while underemphasizing program development concerns. These SEAs focus the bulk of their administrative resources on assuring that districts have met federal compliance

standards. They may take this approach to meet system maintenance concerns (as in the four nondirective states) or to fulfill the role of system regulator (as in the directive state). In any case, none of these five states used the structure of Title I to promote improvements in local programs or to encourage program development procedures intended for local rather than state purposes.

By contrast, the other three states have made a point of becoming involved in program development aspects of local Title I administration. None of these states views its role as primarily that of simply assuring district compliance with federal regulatory standards. In fact, two have, in the past, questioned whether assuring compliance should be a significant aspect of their role. In these two states, a program development role was seen as an alternative to bureaucratic activity. These states felt that their proper role was leadership to improve program quality rather than to assure regulatory compliance. In the final state, a conscious effort has been made to strike a balance between bureaucratic and programmatic concerns.

A second important distinction between directive and nondirective states is the willingness of an SEA to use its authority under the federal regulations to promote federal and state interests, and the acceptance by LEAs that the state has a legitimate and well-defined role to play in local Title I affairs. Directive states have made it clear to LEAs that the state has the authority and responsibility to insure that Title I requirements are followed, and in the three states that have been concerned with program development, local acceptance of the legitimacy of the state's role has been an important factor.

The overall lack of serious local attention to needs assessment, program design, program evaluation and parent involvement in most of the districts in the four nondirective and the one directive but bureaucratically oriented states, reflects the belief that neither the state nor the federal government has a legitimate and/or useful role to play in these areas. The importance or lack of importance of these activities from the

state's perspective is communicated to local districts in each phase of the administrative process: application review, formal monitoring visits to LEAs, enforcement activities, informal contacts with local officials, and in more formal technical assistance workshops. Particularly in those areas wuch as program development where the federal requirements are more complex to interpret and implement, and where the federal government has been unclear and inconsistent in its expectations, SEA officials in directive states have tried to "fill in the gaps" and to take initiatives on their own. It also is not coincidental that the three program oriented states have large state compensatory education programs that supplement and compliment the federal program.

Another way that directive states differ from nondirective with respect to the program development areas, is in the extent to which they have developed the expertise at the state level to provide direction to or assistance to LEAs. The technological side of needs assessment and evaluation clearly requires considerable attention, and the three directive and program oriented states have staff in the SEA who are recognized by local officials as having the "authority of expertise" that helps legitimize state intervention into local program design procedures. In two of the three states, statewide testing programs coupled with the state compensatory education program have been highly visible and important educational issues for the past several years.

Directive, Program Oriented States

While there seems to be a direct linkage between state-level interest in using the structure of Title I and state compensatory or other categorical aid programs as vehicles for promoting program development activities in LEAs, and these linkages are reflective of the role orientation of the SEA, the limitations of state strategies are important to understand. In this section two states that have been recognized as leaders in one or more aspects of program development at the local level will be examined.

State A has, since the late 1960's, enjoyed considerable leadership from the state board of education, the chief state school officer and SEA staff directed towards the improvement of the quality of education in general and compensatory education in particular. Assessment and evaluation programs have dominated much of the debate over educational policy, and the expertise of SEA evaluation staff is widely recognized. In three of the four LEAs included in the SRC study of this state, local practices in needs assessment or evaluation are more advanced and more in keeping with both state and federal objectives than in but two or three of the other districts studied. Nevertheless, it is difficult to identify direct effects of state strategies on any one of the districts.

Though the state board of education's stated policy regarding needs assessments calls for identification of special needs in such areas as the affective and psychomotor domains, and of factors deemed causal or contributive to educational deprivation such as health, handicaps, and poverty, only one of the four districts conducted such a comprehensive assessment of pupil needs. At that, however, this LEA was the only one in the national SRC study to do so.

In the middle size urban district in this state, comprehensive evaluation to improve district and school decision making is a major objective of the administration of compensatory education programs. The district's large evaluation staff has developed an Instructional Management System that includes a bank of criterion items, and which is designed for teacher and principal use in pupil needs assessment and evaluation, program evaluation and, as a by-product, fulfilling state reporting requirements. Though the district's efforts have emphasized development and implementation of the technology of the IMS, and the commitment and the expertise seem to be available to make the system an integral component of Title I planning and decision making, as yet the technological capacity seems to far exceed its usage at either the central office or the school levels. Even that which has been accomplished, however, seems to be unique among the districts included in the SRC study. The SEA's contributions to the district's

efforts in evaluation are seen by LEA officials as (1) the establishment of a climate in which a serious focus on evaluation could be legitimized in the district, (2) the ready availability of the SEA's expertise, and (3), continuing moral support from SEA staff.

The largest district in State A has developed a technologically sophisticated system for identifying the relative reading and math needs of pupils, that is quite unique among the 32 LEAs included in the SRC study. This district's computer data bank produces for each school listings of pupils rank ordered by test results, and the potential exists for matching gain scores on reading and math tests to the types of compensatory services received. Though not mandated by the SEA, the data bank was developed in response to the possibility that state compensatory education funds might be withheld because in 1973 the district could not produce both pre-test and post-test scores for a large number of pupils participating in state compensatory education programs.

The technological and, to some extent, the usage characteristics of the three districts in this state are clearly more impressive than those of other districts included in the SRC study. Nevertheless, they still fall far short of the comprehensive program planning procedures for local districts that would seem to be expected by the federal government, and which are the key objectives in overall school improvement programs. Indeed, three of the four LEAs in State A still view needs assessment only as a selection and assignment of pupils function, and three view evaluation primarily as a state reporting requirement. Also, neither of the two largest LEAs has conducted a comprehensive needs assessment to justify the extensive supplementary and supportive services provided under Title I and the state program, nor has the SEA required evaluations of the direct outcomes of these services. Rather, LEAs are required to report to the SEA only achievement test results, though they are expected to indicate in the annual application certain process objectives and how those objectives will be evaluated.

On balance, State A's long standing emphasis on assessment and evaluation activities seems to have had a more pronounced effect on SEA

management practices than on LEA decision making. The SEA's practice of identifying districts with low achievement results prior to approval of the annual application, and what may be an increasing effort to discourage LEAs from relying heavily on teacher aides as a result of a state contracted evaluation of compensatory education programs, are indications of this intent. In contrast, we are not aware of program design changes made in any one of the four districts based on the findings from a district's own program evaluation.

Until 1976, State B's compensatory education staff was predominately concerned with program development activities to the virtual exclusion of bureaucratic or regulatory functions. Indeed, SEA officials seemed to view their leadership role as inconsistent with a regulatory role; they relied on persuasion rather than force, the authority of expertise rather than statuatory authority. Particularly in the areas of needs assessment and evaluation, the expertise of SEA staff was indeed impressive, and the USOE had, on numerous occasions, commended the state for efforts in these areas. Without question, the SEA's compensatory education staff believed that it was their mission to do whatever they could to improve services for educationally deprived pupils. They expected that the districts to whom they provided technical assistance would be responsive to SEA direction. In this sense, the role orientation of the compensatory education staff was very much at variance with the ethic of localism that pervaded the rest of the SEA.

The SEA compensatory education staff in State B acted upon their interest in local programming most notably in the state's largest urban district, where state priorities for developing exemplary and model programs were stressed. Other districts were generally left to pursue their own course with respect to program development, and the extent of state influence was primarily a function of whether or not SEA staff had given particular attention to an individual district. SEA staff tried to provide help to districts requesting assistance in the design of needs assessments and evaluations. However, the capacity of a very small SEA staff to work

with individual districts was limited. And despite the strong state technical assistance available in needs assessment, the linkage between assessment and program design was practically nonexistent. Rather, needs assessment data seemed to be used by LEAs only to support program decisions that had been based upon more pragmatic criteria.

The approach used by the SEA in evaluation was not to pressure districts to test for state purposes, but rather to solicit local participation by convincing district officials that state level analysis could contribute to a better understanding of their own programs. Indeed, the SEA has used evaluation data produced by LEAs to identify the key factors that seemed to be related to program effectiveness -- both achievement and attitude -- and then established either state policy for program design or recommendations to local districts, based on the results of the state analyses. The SEA produced readable annual evaluation reports intended for use by teachers, principals and parents under the assumption that such information would affect the design of local programs.

This state "evaluation research" strategy has had predictable results. Local districts generally treat evaluation as a statistical and accounting activity. Very little attention is accorded evaluation data by the districts in terms of identifying deficiencies in their own programs. Clearly, the state has not adopted a strategy for building the capacity of local districts to make more effective decisions regarding the design and implementation of compensatory education programs.

Summary

The structure of ESEA Title I would seem to require states and local school districts to give considerable attention to the needs assessment and evaluation activities intended to influence the design of compensatory education programs. But it seems clear that, for the structural characteristics of the federal program to have a direct effect on LEAs, the SEA role must include promoting the improvement of local programs. For most states,

except where the federal requirements are unambiguous, the approach to the design and evaluation of Title I funded programs seems to fall within the category of local prerogatives with relatively little intervention from SEAs. Even those states oriented towards a more directive role in needs assessment, program design and evaluation, seem to focus most of their energies on the utility of these activities for state rather than local purposes. Little attention is given to building the capacity of LEAs to conduct program development activities for local program improvement purposes. Even in State A where the LEAs included in the SRC study seemed to be generally more concerned with needs assessment and evaluation than districts in other states, and where one of the four districts studied had made an unequivocal commitment to school site management, the local use of needs assessment and evaluation information was not a function of a direct influence on the part of the SEA.

In State B where the SEA Title I office's strategy was to take an individualistic, technical assistance approach to the program development areas, there was uniformity to the formal reporting of needs assessment and evaluation information, but considerable variation in the local capacity to utilize such information for local purposes. Indeed, despite the rather substantial state efforts in these areas, there was virtually no relationship between either needs assessment and evaluation activities and changes made in the design of Title I programs.

It would seem, then, that the intergovernmental structure of Title I -- the regulations, administrative procedures, organizational arrangements -- has not worked particularly well in some states and not at all in others in encouraging LEAs to develop systematic and comprehensive procedures for improving programs funded by Title I. This may not be an inherent weakness in the structural approach to change, but rather a specific failure on the part of the federal government. Both the SRC study and the complimentary NIE study of the legal framework of Title I conducted by the Lawyers' Committee for Civil Rights Under Law found almost complete confusion about what the federal government actually expected states and districts to do

in the program development areas. For example, the LCCRUL observed in its report to the NIE,

> State policies on program development are extraordinarily diverse, so diverse, in fact, that it is at times difficult to believe that they all respond to the same federal legal framework.
>
> In investigating, we found that many state policies, in more respects than one, do not in fact respond to the federal legal framework, and that a primary cause of this is that the federal legal framework, on many issues, is discernible only after painstaking analysis of the statute, regulations, program guides, directives, handbooks, technical assistance packets, and OE correspondence. Many states simply do not have all that paper, let alone the inclination to scrutinize it, circling, underlining, referring back and forth.
>
> Major issues are in need of clarification and many federal standards need to be moved from obscurity to prominence. New regulations should do these things. The task is actually quite easy; most of the thinking has already been done. The wisdom of ten years' experience needs simply to be cleanly and crisply set forth.[6]

If even the clarity that has been provided in the funds allocation regulations over the past several years could be applied to the program development area, SEAs and LEAs would become well aware of the federal government's expectation that Title I needs assessments and evaluations should be directly tied into local decision making about program design. The process regulations in the program development area should be no more difficult to implement than regulations specifying how funds should be allocated to schools and pupils.

A second characteristic of the federal role also has had a major influence on how SEAs approach program development concerns, particularly the evaluation issue. The federal government's preoccupation with evaluation data for national purposes, data that would permit judgments to be made about the relative effectiveness of different programs, has clearly placed a premium on state and federal rather than local uses of evaluation. Even such a directive state as A with its highly competent evaluation staff, has given far greater attention to fulfilling the SEA's own evaluation needs at the expense of a concerted effort to improve the capacity of LEAs to conduct needs assessments and evaluations for their own purposes. Moreover, the preoccupation with evaluation data for state and federal reporting purposes has clearly resulted in the narrow view of evaluation as simply achievement testing. Until such time as the federal government and in turn the states communicate to LEAs that evaluation is an important <u>local</u>

function that requires a variety of information, it is unreasonable to expect any other than the most creative LEAs to perform differently.

Implications for Reform at the Local Level

What, then, are the implications for state education reform strategies based upon what we've learned from Title I? The following are most important.

1. State expectations for the improvement of local programs must be explicit. The experience with Title I shows that when expectations are not communicated clearly, LEAs will generally do nothing. District officials must know what to do and how to do it in order to comply. In short, compliance with regulations is as important in program development as in fund accounting.

2. SEA staff must communicate the importance of program development procedures through their interactions with LEA officials. Directive states expect serious responsiveness from LEAs; nondirective states are satisfied with "paper" compliance. LEAs will be responsive to the process of program development if the state consistently communicates the importance of the process through program approval, technical assistance, document dissemination and on-site monitoring visits.

3. States must recognize that local evaluation needs are not neses-sarily synonymous with state needs. For SEAs to commit a substantial portion of their resources to local capacity building, and for LEAs to do the same, the short term price may be a reduced capacity to meet state-level information needs, particularly where state needs are based on uniformity of data. The concept of mutual adaptation is as applicable to the implementation of a decision process as it is a specific programatic innovation.

4. LEAs need technical assistance from SEAs and some need much more than others, but technical assistance should compliment rather than substitute for clearly stated state expectations for local action. Frequent contact between state and local officials is important, and it should be designed to communicate to LEAs how to do what the state has already indicated they should do.

5. Technical assistance functions should not be separated from compliance/monitoring functions in SEAs. The same state staff should do both. Clarity in communications comes, in part, from consistency.

6. Fiscal incentive programs to promote program development decision procedures can be helpful, but like Title I, such slack resources will eventually end or become institutionalized. Planning grants special program funds, when coupled with special requirements, can help to get new procedures started. In the long term they will only work if the state is prepared to expect LEAs to followthrough on initial activities.

FOOTNOTES

[1]Robert J. Goettel, Bernard A. Kaplan and Martin E. Orland, A Study of the Administration of The Elementary and Secondary Education Act, Title I in Eight States, Report to the National Institute of Education, contract No. 400-76-0057, Syracuse Research Corporation, October 1977.

[2]Ibid., Chapter 6.

[3]Robert Silverstein and Daniel M. Schember, An Analysis of the Necessity, Clarity, and Restrictiveness of the Program Requirements Applicable to Local School Districts Applying for Grants Under Title I of the Elementary and Secondary Education Act of 1965, Report to the National Institute of Education, contract No. 400-75-0081, Lawyers' Committee for Civil Rights Under Law, December 1976, p: 212.

[4]Ibid., p: 271.

[5]Ibid., p: 426.

[6]Ibid., pp: 214-215.